

RICK SNYDER GOVERNOR MICHAEL P. FLANAGAN STATE SUPERINTENDENT

April 25, 2014

#### **MEMORANDUM**

**TO:** Consolidated Application Grant Main Contacts of Agencies that Receive Title I,

Part A, Improving Basic Programs Funding

FROM: Michael W. Radke, Director, Office of Field Services (OFS)

**SUBJECT:** Title I and Homeless Education Coordination

The Michigan Department of Education (MDE) is required under Title I, Part A, Section 1112(a)(1) and Title X, Part C, Sections 722(g)(4)(B); 723(d)(2) of the *Elementary and Secondary Education Act of 1965* (ESEA) to coordinate services to homeless students and to ensure that the homeless services are comparable between Title I and non-Title I schools.

In February of 2014, the Consolidated Appropriations Act was passed by the U.S. Congress. Sections of this Act revised the way that Title I and Title X (McKinney-Vento Homeless Education) may coordinate services to homeless students. The US Education Department (USED) has also issued guidance regarding the implementation of these revisions. Copies of the legislation and guidance, as well as this memo, may be located at the OFS website: <a href="www.michigan.gov/ofs">www.michigan.gov/ofs</a> and <a href="www.michigan.gov/homeless">www.michigan.gov/homeless</a>.

The MDE/OFS has updated documents that must be used for district planning and coordination purposes for the 2014-15 Consolidated Application cycle. These documents can be located on the Office of Field Services websites: www.michigan.gov/ofs and www.michigan.gov/homeless.

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# These provisions of the Consolidated Appropriations Act of 2014 apply to all public schools, regardless of:

- Title I funding status
- Title I building status
- Number of homeless students identified
- McKinney-Vento Homeless Grant Consortium member status

#### SUMMARY OF UPDATES from the Consolidated Appropriations Act of 2014:

- As of the 2014-15 school year, LEA Title I Homeless Reservations may be used for transportation of homeless students to their schools of origin, once the student is permanently housed. This would continue through the remainder of the current school year.
- Districts' Comprehensive Needs Assessments <u>must</u> consider transportation of homeless students as one of the LEA needs.
- As of the 2014-15 school year, MV Liaisons may be paid up to 100% with Title I funds, even without other Title I duties, since ALL homeless students are categorically Title I students. Please note that this must be included in the regular salaries Title I funding, not in the homeless reservation, and will count toward the district's 10% administrative cap under function code 226.

## The USED Guidance (3-21-14) associated with this legislation states -

"... under ESEA section 1115(b)(2)(E), homeless children and youth who attend any school served by a local educational agency (LEA), regardless of whether the school receives Title I funds, are eligible to receive Title I services." To ensure that resources are available for this purpose, ESEA section 11113(c)(3)(A) requires an LEA to reserve from its Title I allocation 'such funds as are necessary' to provide to homeless children and youth who attend non-Title I schools 'services comparable to those provided to children in schools' funded under Title I. Therefore, an LEA must annually determine an appropriate reservation among and uses for that reservation in order to provide comparable services. An LEA can do so through a comprehensive needs assessment or other similar approach.

...This eligibility is based on their status as homeless and is not dependent on low academic achievement."

# I. Coordination Between Title I, Part A and McKinney-Vento Homeless Education

The UPDATED Question and Answer document attached is MDE's guidance to the LEA to coordinate services between Title I and McKinney-Vento. It is expected that the LEA Title I Coordinator and the LEA Homeless Education Liaison become familiar with the contents of this document prior to coordinating and planning services for homeless students for the coming school year.

## **II. Homeless Reservation Template**

All LEAs must complete and attach the UPDATED Title I, Part A Homeless Reservation Template to the 2014-15 Consolidated Application. It is expected that the LEA Title I Coordinator and the LEA Homeless Education Liaison work together to complete the template. If the LEA Title I Coordinator and the LEA Homeless Education Liaison are the same person, it is expected that additional stakeholders will assist with the coordination and planning for homeless students. Consider the McKinney-Vento Homeless Education Grant Coordinator for your regional consortium, as well as other LEA administrators.

At the time of the Title I-A amendment, the LEA Homeless Reservation Template must be amended also. Remove the template from the Consolidated Application Homeless Template upload and upload the completed updated Homeless Reservation Template form.

If you have specific questions regarding Title I and homeless education concerns during your planning and coordination of services to homeless students, contact your Field Service Consultant. If you have specific McKinney-Vento homeless education questions, contact Pam Kies-Lowe, the Homeless Education Consultant at <a href="mailto:kies-lowep@michigan.gov">kies-lowep@michigan.gov</a>, or Shereen Tabrizi, Special Populations Manager at <a href="mailto:tabrizis@michigan.gov">tabrizis@michigan.gov</a> or by phone at 517-241-1162.

Attachments (4)